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Attorneys for Defendant
Wells Fargo Dealer Services, Inc.,
Formerly known as Wachovia Dealer Services, Inc.
and WFS Financial, Inc.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

SHANEE N. POLLITT, on behalf of
herself and all others
similarly situated,

Plaintiff,

v.

DRS TOWING, LLC, d/b/a ADVANCED
FINANCIAL SERVICES, WACHOVIA
DEALER SERVICES, INC. d/b/a
WDS, INC., WFS FINANCIAL, WFS
FINANCIAL, INC., and JOHN DOES
1 to 10,

Defendants.

Electronically Filed

Civil Action No.
10-CV-01285 (AET) (DEA)

ANSWER ON BEHALF OF DEFENDANT
WELLS FARGO DEALER SERVICES,
INC. TO CROSSCLAIMS OF
DEFENDANT DRS TOWING, LLC,
d/b/a ADVANCED FINANCIAL
SERVICES

Defendant Wells Fargo Dealer Services, Inc., formerly known
as Wachovia Dealer Services, Inc. and WFS Financial Inc.
("WDS"),¹ as and for its Answer to the Crossclaims of defendant

¹ Wachovia Dealer Services, Inc. is now known as Wells Fargo Dealer Services, Inc. There is no entity named WFS Financial.

DRS Towing, LLC, d/b/a Advanced Financial Services ("DRS"),
says:

AS TO THE CROSSCLAIM FOR CONTRIBUTION

WDS denies that it is a joint tortfeasor pursuant to the New Jersey Joint Tortfeasors Act, N.J.S.A. 2A:53A-1, et seq. and the Comparative Negligence Act, N.J.S.A. 2A:15-5.1, et seq., or that it is liable to DRS for contribution.

AS TO THE CROSSCLAIM FOR INDEMNIFICATION

WDS denies that it is liable to DRS for contractual or common law indemnification.

GREENBAUM, ROWE, SMITH & DAVIS LLP
Attorneys for Defendant
Wells Fargo Dealer Services, Inc.

By: _____

John D. North

Dated: November 16, 2010